To: jweis@andromeda.rutgers.edu[jweis@andromeda.rutgers.edu]
From: Kluesner, Dave
Sent: Mon 12/9/2013 10:58:39 PM
Subject: RE: Fish exchange in the Passaic River

Thank you for your comments. I am forwarding your email to the EPA project team.

-----Original Message-----
From: Judith S. Weis [mailto:jweis@andromeda.rutgers.edu]
Sent: Sunday, December 08, 2013 7:54 PM
To: Kluesner, Dave
Subject: Fish exchange in the Passaic River

Please enter these comments into the official public comments.

To the EPA:
I am a Professor at Rutgers who has studied the the pollution in the Northern NJ estuaries, including the Arthur Kill and Newark Bay, for decades. I would like to comment on the "fish exchange" program proposed by the companies responsible for the cleanup of the Passaic River. I am in full agreement with the editorial in the Star Ledger on Dec. 1 2013.

The Diamond Alkali site was designated a Superfund site in 1984, and the site has expanded to include the lower 17 miles of the Passaic River, Newark Bay and portions of the Hackensack River, Arthur Kill and Kill van Kull. The companies responsible for the pollution have fought for years against a comprehensive cleanup of the contaminated sediments, and are now proposing to exchange toxic fish caught in the River for clean fish grown in an indoor aquaculture facility they plan to develop. The reason is
obvious: if the pathway to human exposure is eliminated, they might avoid the need to dredge out contaminated sediments, and save a lot of money.
This is a faulty plan for numerous reasons.
1. Will they have people stationed at all places along the river where people might fish and at all times of day when people might fish?
2. What about people who are crabbing and wish to have crabs for dinner?
3. The cleanup of the River's sediments is needed, not only to alleviate potential human health effects of eating contaminated fish, but also the effects of the pollution on the animals and plants that live in the river.
The contamination had affected the resident biological community in numerous ways (which I have studied), none of which will be alleviated by this scheme.
4. Have their economic consultants considered the costs of maintaining the aquaculture facility for about a century, which is probably around the length of time it will take for natural attenuation to clean up the sediments without dredging? Those numbers might not be much less that the current costs of comprehensive dredging and cleanup.

I am mortified that my university is in any way associated with this absurd, laughable, plan.

Sincerely,

Judith S. Weis, Ph.D.
Professor (Emerita) of Biology
Rutgers-Newark

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